

Directors

PHILIP L. ANTHONY
 WES BANNISTER
 KATHRYN L. BARR
 JOHN V. FONLEY
 DANIEL E. GRISSET
 LAWRENCE P. KRAEMER JR.
 GEORGE OSBORNE
 LANGOON W. OWEN
 ARNT G. "BUD" QUIST
 BOB ZEMEL



ORANGE COUNTY WATER DISTRICT

Officers

KATHRYN L. BARR
President
 GEORGE OSBORNE
First Vice President
 WES BANNISTER
Second Vice President

WILLIAM R. MILLS JR.
General Manager
 CLARK IDE
General Counsel

December 14, 1995

Mr. Bob Holub
 Santa Ana Regional Water Quality Control Board
 2010 Iowa Avenue, Suite 100
 Riverside, CA 92507-2409

RE: Request for Closure by American Electronics, Inc., Fullerton, California

Dear Bob:

Orange County Water District (OCWD) staff has reviewed available information regarding the above referenced site and has the following comments:

1. The groundwater monitoring review section of the report entitled *Quarterly Vapor Extraction System Progress Report and Fourth Round of Semiannual Groundwater Monitoring for the American Electronics, Inc. Facility Located in Fullerton, California* dated March 23, 1995 fails to recognize the significance of well BP-4 as the well most directly upgradient from the chemical storage areas at the southwest corner of the site. This well is more appropriate for chemical concentration comparison than wells BP-2 and BP-3. Concentrations of TCE in well BP-4 have been consistently lower than in wells BP-2 and BP-3.
2. TCE concentrations have been consistently higher in downgradient well BP-1 and BP-8 than in well BP-4. In fact, TCE concentrations in BP-1 and BP-8 are more than ten times greater than the MCL (February 1995 sampling event).
3. We believe that available soil and water quality data collected at the site clearly demonstrate that the past operations of American Electronics have caused groundwater VOC contamination. This is acknowledged by American Electronics in its report entitled *Phase II Subsurface Investigation for the American Electronics Inc. Facility Located at 1600 East Valencia Drive in the City of Fullerton, California, August 30, 1991* where it states that "groundwater beneath the site has been impacted with VOCs, primarily PCE and TCE".


P.O. BOX 8300, FOUNTAIN VALLEY, CA 92728-8300 • 10500 ELLIS AVENUE, FOUNTAIN VALLEY, CA 92708
 TELEPHONE (714) 378-3200 FAX (714) 378-3373

Mr. Bob Holub
December 14, 1995
page 2 of 2

In summary, we believe that TCE in wells BP-1 and BP-8 remains at levels that threaten basin drinking water supplies. Based on this, we recommend that the Santa Ana RWQCB provide American Electronics, Inc. an option to either continue with the current semiannual groundwater monitoring program while OCWD evaluates the feasibility of a regional groundwater cleanup program or begin remediation of the groundwater beneath the site to VOC levels at least consistent with those in upgradient well BP-4.

If you have any further comments please call me at (714) 378-3245.

Sincerely,



Marina D. West
Hydrogeologist

cc: Mr. Mark Cousineau - Cousineau, Lundblad & Assoc, Inc.
Mr. William Weaver - Applied Geosciences, Inc.